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Attorneys for Defendant, MONIQUE CONTRERAS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

PEOPLE OF CITY OF LOS ANGELES
WHO ARE UN-HOUSED, AS A
CLASS REPRESENTED BY D.
JACOBS, as representative of a class of
unhoused persons who reside and resided
in the streets and on the sidewalks of the
City of Los Angeles,

Plaintiffs.

v.

KAREN BASS, ERIC MICHAEL
GARCETTI, PAUL KREKORIAN,
ROBERT BLUMENFIELD, NITHYA
RAMAN, KATY YAROSLAVSKY,
IMELDA PADILLA, MONICA
RODRIGUEZ, MARQUEECE-
HARRIS-DAWSON, JOHN LEE,
CURREN PRICE, HEATHER HUTT,
TRACI PARK, HUGO SOTO-
MARTINEZ, KEVIN DE LEON, TIM
Mc OSKER, MONIQUE CONTRERAS,
1"DOE" BROWN, ONE HUNDRED
UNKNOWN NAMED DEFENDANTS,
1-100,

Defendants.

CASE NO. 2:24-cv-09320 DOC (MAAx)
*Assigned to: Hon. Judge David O. Carter, Ronald
Reagan Cthse, Ctrm 10A; Hon. Mag. Maria A. Audero,
Roybal Bldg, Ctrm. 880*

**DEFENDANT MONIQUE
CONTRERAS'S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT, OR
ALTERNATIVELY, PARTIAL
SUMMARY JUDGMENT;
DECLARATION OF TY A. FORD;
EXHIBITS**

[Fed. R. Civ. P. 56]

*[Filed concurrently with Notice of Motion for
Summary Judgment; Separate Statement of
Uncontroverted Facts and Conclusion of Law;
Declarations of Monique Contreras and Eric
Melendez w-Exhibits; Notice of Lodging Flashdrive
and [Proposed] Order]*

Date: Julv 14. 2025
Time: 8:30 a.m.
Crtrm.: 10A

Trial Date: Mav 12. 2026
Complaint Filed: October 29, 2024

**TO THE ABOVE-ENTITLED COURT AND TO PLAINTIFFS AND THEIR
COUNSEL OF RECORD HEREIN:**

Pursuant to Federal Rule of Evidence 201(b)(2), Defendant Officer **MONIQUE CONTRERAS** respectfully submits this Request for Judicial notice in support of her Motion for Summary Judgment, or Alternatively, Partial Summary Judgment.

Defendant requests that this Court take judicial notice of the misdemeanor complaint and criminal court minute orders in *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01, which are attached to the supporting Declaration of Ty A. Ford submitted concurrently herewith.

This Request for Judicial Notice is made pursuant to Rule 201 of the Federal Rules of Evidence as well as *Mack v. South Bay Beer Distributors, Inc.*, 798 F.2d 1279, (9th Cir. 1986); *Lee v. Cty of Los Angeles*, 250 F.3d 668, (9th Cir. 2001). This request for judicial notice will be based upon the attached Declaration of Deputy City Attorney Ty A. Ford and Exhibits; Defendant's Motion for Summary Judgment, or Alternatively, Partial Summary Judgment; the pleadings and records contained in the Court's file; and any other oral and documentary evidence presented to the Court at or before the time of the hearing on this Motion.

Dated: June 13, 2025

HYDEE FELDSTEIN SOTO, City Attorney
DENISE C. MILLS, Chief Deputy City Attorney
KATHLEEN KENEALY, Chief Assistant City Attorney
CORY M. BRENT, Senior Assistant City Attorney

By: Ty A. Ford
TY A. FORD, Deputy City Attorney
Attorneys for Defendant, MONIQUE CONTRERAS

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

Federal Rule of Evidence Rule 201(b)(2) allows a Court to take judicial notice of a fact that is not subject to reasonable dispute and is capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. “Facts are indisputable, and thus subject to judicial notice, only if they are either ‘generally known’ under Rule 201(b)(1) or ‘capable of accurate and ready determination by resort to sources whose accuracy cannot be reasonably questioned’ under Rule 201(b)(2).” *United States v. Ritchie*, 342 F.3d 903, 909 (9th Cir. 2003).

A Court shall take judicial notice if requested by a party and the Court is supplied with the necessary information. Fed.R.Evid. 201(c)(2).

In addition, the court is empowered to take judicial notice of court files and records and other public records. *See Lee v. Cty of Los Angeles*, 250 F.3d 668, 689 (9th Cir. 2001).

Based on the foregoing, the Court may take judicial notice of:

Exhibit 5 - Copy of the Misdemeanor Complaint in the matter of *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01.

Exhibit 6 – Copy of the criminal court’s minute order dated 09/04/24

Exhibit 7 – Copy of the Mental Health Court minute order dated 09/18/24

Exhibit 8 – Copy of the Mental Health Court minute order dated 10/02/24.

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Exhibit 9 – Copy of the Mental Health Court minute order dated 10/23/24.

Dated: June 13, 2025

HYDEE FELDSTEIN SOTO, City Attorney
DENISE C. MILLS, Chief Deputy City Attorney
KATHLEEN KENEALY, Chief Assistant City Attorney
CORY M. BRENTE, Senior Assistant City Attorney

By: *Ty A. Ford*
TY A. FORD, Deputy City Attorney
Attorneys for Defendant, MONIQUE CONTRERAS

DECLARATION OF TY A. FORD

I, TY A. FORD, declare as follows:

1. I am an attorney at law, duly licensed to practice law in all the courts of the State of California, including the Central District of California. I am employed as a Deputy City Attorney for the City of Los Angeles in the Police Litigation Section. I have personal knowledge of the information set forth below, except those things set forth on information and belief, and as to those things, I believe them to be true.

2. **Exhibit “5”** attached hereto is a true and correct copy of the Misdemeanor Complaint in the matter of *The People of the State of California v. David Jacobs*, Los Angeles County Superior Court Case No. 24ARCM04227-01.

3. **Exhibit “6”** attached hereto is a true and correct copy of the criminal court’s minute order dated 09/04/24

4. **Exhibit “7”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 09/18/24

5. **Exhibit “8”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/02/24.

6. **Exhibit “9”** attached hereto is a true and correct copy of the Mental Health Court minute order dated 10/23/24.

7. I met and conferred with Defense Counsel, Stephen Yagman, Esq., pursuant to Central District, Local Rule 7-3, on April 15, 2025.

I declare under penalty of perjury pursuant to the laws of the United States of America, and the State of California that the foregoing is true and correct.

Executed this 13th day of June 2025 at Los Angeles, California.

Ty A. Ford
TY A. FORD, Declarant